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## 6 | Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 BOARDS OF TRUSTEES OF THE SHEET  
12 METAL WORKERS LOCAL 104 HEALTH  
CARE TRUST, et al.,

13 | Plaintiffs,

14 | v.

15 EFFICIENT ENERGY CONCEPTS, INC., a California corporation.

Defendant.

Case No.: C15-01000 MEJ

**PLAINTIFFS' REQUEST TO CONTINUE  
CASE MANAGEMENT CONFERENCE;  
[PROPOSED] ORDER THEREON**

Date: June 4, 2015  
Time: 10:00 a.m.  
Location: 450 Golden Gate Ave.  
San Francisco  
Courtroom: B, 15th Floor  
Judge: Honorable Maria-Elena James

18 Plaintiffs respectfully request that the Case Management Conference, currently on calendar  
19 for June 4, 2015, be continued for approximately sixty days. Good cause exists for granting the  
20 continuance, as follows:

21 1. As the Court's records will reflect, this action was filed on March 3, 2015 (Dkt. #1).  
22 Defendant was personally served on March 9, 2015, and a Proof of Service of Summons was filed  
23 with the Court on March 24, 2015 (Dkt. #8). Defendant has not filed a responsive pleading.

24       2.       The parties are in the process of finalizing a payment plan in the form of a Judgment  
25 Pursuant to Stipulation to allow Defendant to satisfy its debt to Plaintiff Trust Funds by making  
26 monthly payments. Plaintiffs anticipate filing the Judgment Pursuant to Stipulation within 30 days.

27           3. There are no issues that need to be addressed by the parties at the currently scheduled  
28 Case Management Conference. In the interest of conserving costs, as well as the Court's time and

1 resources, Plaintiffs respectfully request that the upcoming Case Management Conference be  
2 continued for approximately sixty days, to allow sufficient time for the parties to finalize the  
3 payment plan without further litigation.

4 I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above  
5 entitled action, and that the foregoing is true of my own knowledge.

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7 Dated: May 28, 2015

SALTZMAN & JOHNSON  
LAW CORPORATION

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By: \_\_\_\_\_ /S/

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Shivani Nanda, Esq.  
Attorneys for Plaintiffs

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IT IS SO ORDERED.

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The currently set Case Management Conference is hereby continued to  
August 6, 2015 at 10:00 a.m., and all previously set deadlines and dates  
related to this case are continued accordingly.

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May 28, 2015

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Date: \_\_\_\_\_

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## PROOF OF SERVICE

I, the undersigned, declare:

3           1. I am a citizen of the United States and am employed in the County of San Francisco,  
4 State of California. My business address is 44 Montgomery Street, Suite 2110, San Francisco,  
5 California 94104.

**6** 2. I am over the age of eighteen and not a party to this action.

7 3. On **May 28, 2015**, I served the following document(s):

**PLAINTIFFS' REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE;**

## [PROPOSED] ORDER THEREON

10 on the interested parties in said action by enclosing a true and exact copy of each document in a  
11 sealed envelope and placing the envelope for collection and First Class mailing following our  
12 ordinary business practices. I am readily familiar with this business' practice for collecting and  
13 processing correspondence for mailing. On the same day that correspondence is placed for  
14 collection and mailing, it is deposited in the ordinary course of business with the United States  
15 Postal Service in a sealed envelope with postage fully prepaid.

**16** 4. The envelopes were addressed and mailed as follows:

Efficient Energy Concepts, Inc.  
Robert Peters  
7 Three Sevens Lane  
Chico, CA 95973

20 I declare under penalty of perjury that the foregoing is true and correct and that this  
21 declaration was executed on **May 28, 2015**, at San Francisco, California.

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Alicia Ramirez Wood  
Paralegal